Peter E. Brill David Gray Mitchell Hirsch\* Rita Bonicelli\* Matthew Haicken\* James Moschella\* \*Of Counsel

Via ECF

Hon. P. Kevin Castel United States District Judge **United States Courthouse** 500 Pearl Street New York, New York 10007 June 3, 2020

Sentencing is adjourned until September 16, 2020 at 11:00 a.m.

SO ORDERED.

Dated: 6/3/2020

Kevin Castel United States District Judge

United States v. Juan Antonio Hernandez Alvarado Re:

15 Cr. 379

Dear Judge Castel:

I represent Mr. Hernandez Alvarado. I write to request that Mr. Hernandez Alvarado's sentencing, currently scheduled for June 5, be adjourned for at least a month based upon my previous discussions with the Court about access to my client. The government is consenting to a month-long adjournment at this point.

Since our last discussion, I have had extremely limited access to my client. There has been no in-person visiting and only the ability to speak by phone for short periods of time under less-than-ideal circumstances. As you can imagine, it is extremely difficult to build rapport with a client whom you have never met; even more so when you have to use an interpreter. As such, I have been unable to complete an appropriately thorough sentencing submission.

I do not anticipate that a one-month adjournment will be sufficient. However, as per AUSA Amanda Houle, the government agrees to revisit the issue in July once we know where things stand. As such, I am respectfully requesting that this matter be adjourned until July 6 or 7, 2019, or a time thereafter that is convenient to the Court. For your information, I have another conference in the Eastern District in Brooklyn at 10:00 am on July 7, so that the Court can avoid a scheduling conflict.

Thank you for your consideration.

Respectfully submitted,

Peter E. Brill

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